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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application of:

Daryl L. Champagne et al.

Serial No.: 09/543,686

Filed: April 5, 2000

Group Art Unit: 3625

Examiner: M. Gart

For: **ONLINE SYSTEM AND METHOD OF ORDERING AND SPECIFYING CONSUMER PRODUCT HAVING SPECIFIC CONFIGURATIONS**

Attorney Docket No.: 81050056 / FMC 1734 PUSP

APPEAL BRIEF

Mail Stop Appeal Brief - Patents

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Sir:

This is an Appeal Brief from the final rejection of claims 1-44 of the Office Action mailed on July 28, 2004 for the above-identified patent application. Applicant filed a Notice of Appeal on September 24, 2004. This application was filed on April 5, 2000.

I. REAL PARTY IN INTEREST

The real party in interest is Ford Motor Company, a corporation organized and existing under the laws of the state of Delaware, and having a place of business at The American Road, Dearborn, Michigan 48121, as set forth in the assignment recorded in the U.S. Patent and Trademark Office on April 22, 2003 at Reel 010746/Frame 0722.

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II. RELATED APPEALS AND INTERFERENCES

There are no appeals or interferences known to the Appellant, the Appellant's legal representative, or the Assignee which will directly affect or be directly affected by or have a bearing on the Board's decision in the pending appeal.

III. STATUS OF CLAIMS

Claims 1-44 are pending in this application. Claims 1-44 have been rejected and are the subject of this appeal.

IV. STATUS OF AMENDMENTS

No amendment after final rejection was filed.

V. SUMMARY OF CLAIMED SUBJECT MATTER

Three independent claims are involved in this appeal, claims 1, 21, and 26.

Claim 1 is directed to an online method of ordering and purchasing customized products. page 19, lines 17-20. The method includes receiving a custom order message incorporating order data and product configuration data submitted by an online user. page 19, lines 20-28. The method also includes storing the order data and product configuration into a buyer database. page 20, line 32 through page 21, line 2. The method includes entering the custom order and order data and product configuration into an order bank to be scheduled for manufacturing. Fig. 22. The method includes canceling the custom order after processing of the custom order is initiated and before the custom order is scheduled for manufacturing if a cancel request is received from the user. Fig. 21. The method also includes generating an order confirmation message and sending the order confirmation message to the user. Fig. 23.

Claim 21 is directed to an online custom product ordering and purchasing system. page 19, lines 17-20. The system includes an online user interface operable to provide product configuration and to receive an online order for a product having a specific product configuration. page 19, lines 20-28. The system also includes a web server operable to receive

the online order from the online user interface. page 19, lines 20-28. The system also includes an order processor operable to receive the online order from the web server and process the order and generate an order confirmation message and send the order confirmation message to a user. Fig. 23. The system also includes an order bank operable to store online order and schedule a product having the product configuration specified in the online order for manufacturing and cancel the custom order after processing of the custom order is initiated and before the custom order is scheduled for manufacturing if a cancel request is received from the user. Figs. 21 and 22.

Claim 26 is directed to a method of ordering and purchasing a vehicle having specific vehicle configurations via the Internet. Figs. 3, 4, 4A and 4B. The method includes receiving a custom order message incorporating vehicle configuration data, order data, and user data submitted by an online user. Fig. 4A and 4B. The method includes storing the order data, user data and vehicle configuration data into a buyer database. page 20, line 32 through page 21, line 2. The method includes processing the custom order. Fig. 22. The method includes entering the custom order and its associated data into an order bank to schedule the specified vehicle for manufacturing. Fig. 22. The method includes canceling the custom order after processing of the custom order is initiated and before the specified vehicle is scheduled for manufacturing of a cancel request is received from the user. Figs. 21 and 22. The method also includes generating an order confirmation message and sending the order confirmation message to the user. Fig. 23.

VI. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

Claims 1-6, 13-31, and 39-44 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over a public use or knowledge of the invention by Toyota (Toyota) in view of U.S. Patent No. 6,167,383 (*Henson*).

Claims 7-12 and 32-38 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over a public use of the invention by Toyota in view of *Henson*, in further view of U.S. Patent No. 6,241,310 (*Green*).

VII. ARGUMENT

A. Claims 1-6, 13-31, And 39-44 Are Patentable Under 35 U.S.C. § 103(a)

The Examiner has rejected claims 1-6, 13-31, and 39-44 under 35 U.S.C. § 103(a) as being unpatentable over a public use or knowledge of the invention by Toyota as evidenced by four periodical references in view of *Henson*.¹ The Examiner's evidence does not demonstrate Toyota's public use or knowledge of the claimed invention.²

"The statutory language 'known or used by other in this country' (35 U.S.C. § 102(a)), means knowledge or use which is accessible to the public." *Carella v. Starlight Archery*, 231 USPQ 644 (Fed. Cir. 1986); M.P.E.P. § 2132. At the minimum, the Examiner must proffer evidence of "one well defined case of such use" to apply the public use bar to patentability. M.P.E.P. § 2133.03(a). The well defined case of such a use must include evidence that each element of the claimed invention is provided or suggested by the public use or knowledge.

¹ The four references are: "Push is on shorten lead-times for custom car orders," Brian Milligan, Purchasing, Boston, October 7, 1999, Volume 127, Issue 5, page 74 (hereinafter referred to as Ref U, as identified on Examiner's PTO-892 form); "Can Car-Makers Emulate Dell? Toyota Tries," Jeffrey Bodenstab, Wall Street Journal, Brussels, August 31, 1999, page 10 (hereinafter referred to as Ref V); "e-Parcel Delivers for Toyota's Production Control Division," Business/Technology/Automotive Writers, Business Wire, New York, June 1, 1999, page 1 (Ref W); and "Customers Move into the Driver's Seat: Personalized products become viable with the net," Otis Port, Business Week, New York, October 4, 1999, Issue 3649, page 103 (Ref X). The Examiner has clustered these periodicals into one omnibus references dubbed "Toyota" and numbered the pages 1-13. For purposes of consistency, the Applicants retain this referencing scheme.

² In the Response To Arguments in the Office Action mailed on July 28, 2004, the Examiner noted that all of the cited articles would qualify as prior art under 35 U.S.C. § 102(a) because the invention was described in a printed publication. Applicants note that the Examiner has not rejected any claims based on the printed publication subsection of § 102(a). Moreover, the Examiner has cited to four articles, but has not put forth which combination of articles or article standing on its own would form the basis of such a rejection. Notwithstanding, none of the references, taken individually or in combination, teach, provide, or suggest the claimed invention.

The periodicals cited to by the Examiner do not demonstrate a well defined public use of the claimed invention by Toyota. Contrary to the Examiner's assertions, the periodicals do not sufficiently inform the public of the claimed invention or allow a competitor to be able to readily ascertain the claimed invention from the cited articles. The periodicals are brief press releases of possible functionality that Toyota may have someday. For the Examiner to argue that such articles allow a competitor to reasonably ascertain each and every element of the claimed invention is solely based on impermissible hindsight obtained from the Applicants' teachings.

The Examiner's main argument is that Toyota's public use of a process called "Logistics Continuous Improvement" qualifies as public use prior art under § 102(a), as evidenced by Refs U-X. After careful examination of the articles and the Examiner's Response to Arguments in the Office Action mailed July 28, 2004, the Applicants respectfully request the Board to reverse the Examiner's determination that Refs U-X demonstrate such a public use or knowledge.

For instance, Ref U, dated October 7, 1999 (less than one month prior to the Applicants' effective filing date of November 5, 1999), states "Toyota Motor Corp. made headlines recently when a representative said the company is taking steps to quicken the time it takes to build customized Camry Solaras at its manufacturing plant in Canada. The process, called Logistics Continuous Improvement, will allow Toyota to start working on the care five days after an order is made." Toyota, page 1. Ref U also states "Mordue says Toyota's system will take much longer than five days. But it still will represent a shortened leadtime." Toyota, page 2. Ref U does not demonstrate a public use of the Logistics Continuous Improvement system, as evidenced by the use of the language "taking steps" and "will." In the Response to Arguments, the Examiner opines that Applicants' excerpts are not relevant since they are not related to the limitations in question of the claimed invention. Applicants note that these excerpts are highly indicative that the LCI system, which Examiner uses as the basis for rejection, was not in public use or possession by the Applicants' filing date.

Moreover, according to well established Federal Circuit precedent, a reference must be considered in its entirety, not just those excerpts that are convenient for the Examiner.

At best, Ref U indicates that Toyota had the intention of using the LCI process publically at an unspecified time in the future. As such, Applicants respectfully request that the Board to remove Ref U as evidence of public use. To the contrary, Applicants submit that Ref U is evidence that the LCI process was not in public use at the time of filing (November 5, 1999) of Applicants' application since it was not publically used by October 7, 1999 and one can reasonably infer that bringing the process online took at least a month due to the "sophisticated" nature of the software embodying the LCI process. Toyota, page 1.

Likewise, Ref V, dated August 31, 1999, states "Toyota Motor Corp. announced recently that it will soon begin producing the Camry Solara to customer order in just five days, and will do the same for other models starting later this year." Toyota, page 6. Ref V provides further evidence about the uncertainty regarding Toyota's process: "How much of a competitive advantage can Toyota gain from a five-day car?" Toyota, page 7. At best, Ref V presents evidence of a prospective use of Toyota's process on an unspecified date. A prospective use does not necessarily give rise to an actual use, and further does not satisfy the Examiner's burden of demonstrating a "well defined case" of public use. As such, Applicants respectfully request the Board to remove Ref V as evidence of public use of the claimed invention.

Ref W presents a red herring of sorts. The Examiner's reliance on Ref W as evidence of public use of the claimed invention is misplaced. Ref W does not disclose or suggest Toyota's use of a process for user customized vehicle orders. Instead, Ref W describes a "behind-the-scenes" software product that Toyota uses in its production control division. According to the periodical, "e-Parcel's best-of-class Internet data delivery service provides us with secure and reliable mechanism necessary for our production control. ... Toyota has been using e-Parcel's technology and service to deliver information and updates internally as well as over 2,000 parts vendors and manufacturers." Toyota, page 8. In further support of the inapplicability of this periodical to the Applicants' claimed invention, the

Examiner does not cite to Ref W in his arguments in support of the § 103(a) rejections. As such, Applicants respectfully request that the Board remove Ref W as evidence of public use of the claimed invention, a request that the Examiner has not addressed.

Ref X, dated October 4, 1999, does not support the Examiner's proposition that the LCI process was in public use prior to the Applicants' effective filing date of November 5, 1999. The author of Ref X makes a passing comment that "General Motors Corp. and Ford Motor Co. will soon join Toyota Motor Corp. in giving the same power to car buyers." Toyota, page 11. The power referred to is "buyers . . . tailor[ing] products the way they want them." *Id.* The periodical does not articulate the functionality underlying the Toyota process. Moreover, the periodical's allusion to current public use contradicts Ref U's clear statement that Toyota's LCI process will be used at an unspecified time in the future since Ref U's publication date (October 7, 1999) is after Ref X's publication date (October 4, 1999). Further, Ref X does not reference Toyota's LCI process, making it unclear as to "what" functionality Toyota gave buyers prior to the Applicants' effective filing date. As such, Applicants respectfully request that the Examiner remove Ref U as evidence of public use, a request that the Examiner has not addressed.

In sum, Applicants respectfully request that the Board withdraw the P.T.O.'s reliance on Refs U-X as evidence of public use of the claimed invention. In its Response of April 12, 2004, Applicants respectfully requested the Examiner to identify a date certain for Toyota's alleged public use so that the Applicants can fully address this ground of rejection. The Examiner reiterated that the publication dates of the periodicals establish the date certain for the public use of its claimed invention. For the reasons set forth above, Applicants respectfully traverse that the publication dates establish the date of public use or knowledge due to the unspecified nature and timing of the functionality disclosed by the articles.

Claims 1-6, 13-31 and 39-44 are rejected under 35 U.S.C. § 103(a) as being unpatentable over a public use of the invention by Toyota in view of U.S. Patent No.

6,167,383 (*Henson*).³ Applicants respectfully request reconsideration of the rejection of claims 1-9 because (1) the Examiner has not carried his burden of demonstrating that the alleged Toyota public use qualifies as § 102(a) prior art and, alternatively (2) the proposed combination fails to teach, suggest, or disclose various aspects of the rejected claim.

Accordingly, as shown in detail above, the Examiner has not provided sufficient evidence to demonstrate that the alleged Toyota public use qualifies as § 102(a) prior art. As such, the alleged Toyota public use cannot be used in the formulation of the Examiner's obviousness rejection. For at least this reason, Applicants respectfully request reconsideration and allowance of rejected claims 1-6, 13-31 and 39-44.

Further, the proposed combination does not teach, disclose, or suggest the invention as recited in claims 1-6, 13-31 and 39-44. The Examiner acknowledges that the alleged Toyota public use does not provide at least two limitations of claim 1: "storing the order data and product configuration into a buyer database" and "generating an order confirmation message and sending the order confirmation message to the user." The Examiner has also failed to provide evidence that the alleged Toyota public use provides for "canceling the custom order processing of the custom order is initiated and before the custom order is scheduled for manufacturing if a cancel request is received from the user," as recited in claim 1. In support of his position, the Examiner cites to Ref U, which states "[t]he problem now is with last minute changes, whereby a supplier gets a production order and then it is changed...It happens quite frequently now." The author of Ref U casts doubt on whether Toyota's proposed LCI process would be able to handle this problem, and certainly does not teach or suggest the claimed canceling step. The other Toyota periodicals certainly do not

³ On page 9 of the Office Action mailed July 28, 2004, the Examiner seemingly rejects claims 26-31 and 39-44 in light of the combination of Toyota, *Green*, and U.S. Patent No. 6,535,294 (*Arledge*). The Examiner cites to *Arledge* stating that "*Arledge* discloses claims 26-31 under the same rationale as set forth above in claims 1-7." Applicants do not understand how the same rationale could be used when *Arledge* is not mentioned in the rejection of claims 1-7. Further, the Examiner did not explicitly reject claims 26-31 and 39-49 in light of Toyota, *Green*, and *Arledge* in the Office Action of July 28, 2004. Notwithstanding, the combination of Toyota, *Green*, and *Arledge* does not teach or suggest any pending claim.

point to any functionality that teaches or suggests the canceling step of claim 1. These deficiencies in the teachings of the alleged Toyota public use are not cured by the teachings of *Henson*. *Henson* does not teach, disclose or suggest the canceling step recited in claim 1, and the Examiner does not present any argument that would indicate otherwise.

The proposed combination also does not teach, disclose, or suggest “an order bank operable to: . . . cancel the custom order after processing of the custom order is initiated before the custom order is scheduled for manufacturing if a cancel request is received from the user,” as recited in independent claim 21. The proposed combination also does not teach, disclose, or suggest “canceling the custom order after processing if the custom order is initiated and before the specified vehicle is scheduled for manufacturing if a cancel request is received from the user,” as recited in independent claim 26.

**B. Claims 7-12 And 32-38 Are Patentable Under 35 U.S.C. § 103(a)
In Light Of The Combination Of Toyota, *Henson*, and *Green***

Claims 7-12 and 32-38 are rejected under 35 U.S.C. § 103(a) as being unpatentable over a public use of the invention by Toyota in view of *Henson*, in further view of U.S. Patent No. 6,041,310 (*Green*). Applicants respectfully request reconsideration of this rejection of claims 1-9 because (1) the Examiner has not carried his burden of demonstrating that the alleged Toyota public use qualifies as § 102(a) prior art and, alternatively (2) the proposed combination fails to teach, suggest, or disclose various aspects of the rejected claim.

For reasons similar to those discussed above with regard to claim 1, the alleged Toyota public use and *Henson* combination does not provide the features and operation recited in claim 7-12, which depend on claim 1. For example, the proposed Toyota-*Henson* combination does not teach, disclose, or suggest “canceling the custom order processing of the custom order is initiated and before the custom order is scheduled for manufacturing if a cancel request is received from the user,” as recited by claim 1. Because this deficiency is not cured by *Green*, the combination of references does not disclose, teach, or suggest the invention as recited in claims 7-12. For at least these reasons, and for those stated above with respect to

claim 1, Applicants respectfully request reconsideration and allowance of claims 7-12 that depend on claim 1.

For reasons similar to those discussed above with regard to claim 26, the alleged Toyota public use and *Henson* combination does not provide the features and operation recited in claim 32-38, which depend on claim 26. For example, the proposed Toyota-*Henson* reference does not teach, disclose, or suggest “canceling the custom order processing of the custom order is initiated and before the custom order is scheduled for manufacturing if a cancel request is received from the user,” as recited by claim 26. Because this deficiency is not cured by *Green*, the combination of references does not disclose, teach, or suggest the invention as recited in claims 32-38. For at least these reasons, and for those stated above with respect to claim 26, Applicants respectfully request reconsideration and allowance of claims 32-38 that depend on claim 26.

The fee of \$340.00 as applicable under the provisions of 37 C.F.R. § 41.20(b)(2), as well as any additional fees or credits, should be applied to Deposit Account 06-1510 (Ford Global Technologies, Inc.). A duplicate of this page is enclosed for this purpose.

Respectfully submitted,

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Enclosure - Appendices

VIII. CLAIMS APPENDIX

1. An online method of ordering and purchasing customized products, comprising:

receiving a custom order message incorporating order data and product configuration data submitted by an online user;

storing the order data and product configuration into a buyer database;

entering the custom order and order data and product configuration into an order bank to be scheduled for manufacturing;

cancelling the custom order after processing of the custom order is initiated and before the custom order is scheduled for manufacturing if a cancel request is received from the user; and

generating an order confirmation message and sending the order confirmation message to the user.

2. The method, as set forth in claim 1, further comprising:

receiving input entered on a web page by the user to submit a custom order, including product configuration data;

generating the custom order message incorporating the product configuration data and sending the custom order message to a web server; and

routing the custom order message to a workflow manager.

3. The method, as set forth in claim 2, further comprising:

sending the custom data to a dealer selected by the user; and

routing the custom order message to a B2B server, which sends it to an order processor.

4. The method, as set forth in claim 1, further comprising generating a unique order number for the custom order.

5. The method, as set forth in claim 1, further comprising:
receiving customer data related to the user from the user; and
storing the customer data in a common membership database.

6. The method, as set forth in claim 1, further comprising:
receiving online payment data from the user for the custom order;
processing the online payment data of the product; and
confirming the online payment processing completion.

7. The method, as set forth in claim 1, further comprising:
displaying a list of product substantially matching product configuration data entered by the online user;

receiving a user-tagging of a particular product from the list and a tag order message incorporating tag order data and product configuration data submitted by the user;
storing the tag order data and product configuration into a buyer database;
modifying inventory data in an inventory database associated with the tagged product to indicate unavailability; and

generating a tag order confirmation message and sending the tag order confirmation message to the user.

8. The method, as set forth in claim 7, further comprising:
receiving input entered on a web page by the user to submit a tag order, including product configuration data;

generating the tag order message incorporating the product configuration data and sending the tag order message to a web server; and
routing the tag order message to a workflow manager.

9. The method, as set forth in claim 8, further comprising:
sending the tag order data to a dealer selected by the user; and
routing the tag order message to a B2B server, which sends it to an order processor.

10. The method, as set forth in claim 7, further comprising generating a unique order number for the tag order.

11. The method, as set forth in claim 7, further comprising:
receiving customer data related to the user from the user; and
storing the customer data in a common membership database.

12. The method, as set forth in claim 7, further comprising:
receiving online payment data from the user;
processing the online payment data of the product; and
confirming the online payment processing completion.

13. The method, as set forth in claim 1, further comprising:
receiving a lead request message incorporating lead data and product configuration data submitted by the user, the lead data identifying the online user as a potential customer;
storing the lead data and product configuration into a buyer database;
generating a lead confirmation message and sending the lead confirmation message to the user.

14. The method, as set forth in claim 13, further comprising:
 - receiving input entered on a web page by the user to submit a lead request, including product configuration data;
 - generating the lead request message incorporating the product configuration data and sending the lead request message to a web server; and
 - routing the lead request message to a workflow manager.
15. The method, as set forth in claim 14, further comprising:
 - sending the lead request data to a dealer selected by the user; and
 - requesting lead status updates from the dealer.
16. The method, as set forth in claim 15, further comprising:
 - receiving a lead status update from the dealer; and
 - storing the lead status update in a buyer database.
17. The method, as set forth in claim 13, further comprising generating a unique lead number for the lead request.
18. The method, as set forth in claim 13, further comprising:
 - receiving customer data related to the user from the user; and
 - storing the customer data in a common membership database.
19. The method, as set forth in claim 1, further comprising:
 - receiving a cancel custom order request from the user;
 - deleting a custom order associated with the cancel customer order request from an order bank; and
 - updating a buyer database to reflect the updated status of the user.

20. The method, as set forth in claim 1, further comprising:
receiving a cancel tag order request from the user;
modifying data associated with a cancelled tag order in an order bank;
modifying data of a product associated with the cancelled tag order in an enterprise product availability database; and
updating a buyer database to reflect the updated status of the user.

21. An online custom product ordering and purchasing system, comprising:
an online user interface operable to provide product configuration and to receive an online order for a product having a specific product configuration;
a web server operable to receive the online order from the online user interface;
an order processor operable to:
receive the online order from the web server and process the order; and
generate an order confirmation message and send the order confirmation message to a user; and
an order bank operable to:
store online order and schedule a product having the product configuration specified in the online order for manufacturing; and
cancel the custom order after processing of the custom order is initiated and before the custom order is scheduled for manufacturing if a cancel request is received from the user.

22. The system, as set forth in claim 21, further comprising a workflow manager operable to receive the online order from the web server, store order data associated with the online order in a buyer database, and route the online order to the order processor.

23. The system, as set forth in claim 21, further comprising a common membership database operable to store customer data associated with the online user.

24. The system, as set forth in claim 21, further comprising an order number generator operable to generate a unique order number for each order.

25. The system, as set forth in claim 21, wherein the online order is for customer ordering a vehicle, the specific product configuration comprises make, model, year, color, engine data, and transmission data of the vehicle.

26. A method of ordering and purchasing a vehicle having specific vehicle configuration via the Internet, comprising:

receiving a custom order message incorporating vehicle configuration data, order data, and user data submitted by an online user;

storing the order data, user data and vehicle configuration data into a buyer database;

processing the custom order;

entering the custom order and its associated data into an order bank to schedule the specified vehicle for manufacturing;

cancelling the custom order after processing of the custom order is initiated and before the specified vehicle is scheduled for manufacturing if a cancel request is received from the user; and

generating an order confirmation message and sending the order confirmation message to the user.

27. The method, as set forth in claim 26, further comprising:

receiving input entered on a web page by the user to submit the custom order, including order data, user data, product configuration data;

generating the custom order message incorporating the product configuration data and sending the custom order message to a web server; and
routing the custom order message to a web server.

28. The method, as set forth in claim 26, further comprising:
receiving a user-selection of a dealer;
sending the order data, user data, and vehicle configuration data to the selected dealer; and
routing the custom order message to a B2B server, which sends it to an order processor.

29. The method, as set forth in claim 26, further comprising generating a unique order number for the custom order message.

30. The method, as set forth in claim 26, further comprising:
receiving user data from the user, including name, address, and contact information; and
storing the user data in a common membership database.

31. The method, as set forth in claim 26, further comprising:
receiving online payment data from the user for the custom order;
processing the online payment data of the vehicle; and
confirming the online payment processing completion.

32. The method, as set forth in claim 26, further comprising:
displaying a list of vehicles substantially matching vehicle configuration data entered by the online user;

receiving a user-tagging of a particular vehicle from the list and a tag order message incorporating tag order data and the vehicle configuration data;

storing the tag order data and vehicle configuration into a buyer database;

modifying inventory data in an inventory database associated with the tagged vehicle to indicate unavailability; and

generating a tag order confirmation message and sending the tag order confirmation message to the user.

33. The method, as set forth in claim 32, further comprising:

receiving input entered on a web page by the user to submit a tag order, including product configuration data;

generating the tag order message incorporating the vehicle configuration data and sending the tag order message to a web server; and

routing the tag order message to a workflow manager.

34. The method, as set forth in claim 32, further comprising:

sending the tag order data to a dealer selected by the user; and

routing the tag order message to a B2B server, which sends it to an order processor.

35. The method, as set forth in claim 32, further comprising generating a unique order number for the tag order.

36. The method, as set forth in claim 32, further comprising:

receiving customer data related to the user from the user; and

storing the customer data in a common membership database.

37. The method, as set forth in claim 32, further comprising:
receiving online payment data from the user;
processing the online payment data of the vehicle; and
confirming the online payment processing completion.

38. The method, as set forth in claim 26, further comprising:
receiving a lead request message incorporating lead data and vehicle configuration data submitted by the user, the lead data identifying the online user as a potential customer;
storing the lead data and vehicle configuration into a buyer database;
generating a lead confirmation message and sending the lead confirmation message to the user.

39. The method, as set forth in claim 38, further comprising:
receiving input entered on a web page by the user to submit a lead request, including vehicle configuration data;
generating the lead request message incorporating the vehicle configuration data and sending the lead request message to a web server; and
routing the lead request message to a workflow manager.

40. The method, as set forth in claim 38, further comprising:
sending the lead request data to a dealer selected by the user; and
requesting lead status updated from the dealer.

41. The method, as set forth in claim 38, further comprising:
receiving a lead status update for the dealer; and
storing the lead status update in a buyer database.

42. The method, as set forth in claim 38, further comprising generating a unique lead number for the lead request.

43. The method, as set forth in claim 26, further comprising:
receiving a cancel custom order request from the user;
deleting a custom order associated with the cancel custom order request from an order bank; and
updating a buyer database to reflect the updated status of the user.

44. The method, as set forth in claim 26, further comprising:
receiving a cancel tag order request from the user;
modifying data associated with a cancelled tag order in an order bank;
modifying data of a vehicle associated with the cancelled tag order in an enterprise vehicle availability database; and
updating a buyer database to reflect the updated status of the user.

IX. EVIDENCE APPENDIX

None

X. RELATED PROCEEDINGS APPENDIX

None